

1 The Honorable Brian A. Tsuchida  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 DAN KWATE, on his own behalf and on behalf  
11 of all other similarly situated,

12 Plaintiff,

13 vs.

14 REECE CONSTRUCTION COMPANY, a For-  
15 Profit Corporation; and STEVEN REECE and  
16 the marital community thereof,

17 Defendants.

18 NO. 2:23-cv-00570

19 **STIPULATED MOTION FOR  
20 EXTENSION OF TIME AND  
21 [PROPOSED] ORDER**

22 NOTED ON MOTION CALENDAR:  
23 December 15, 2023

24 **STIPULATION**

25 Plaintiff Dan Kwate and Defendants Reece Construction Company and Steven Reece  
26 (“Defendants”) (collectively, “Parties”), by and through their respective undersigned attorneys,  
respectfully submit this Stipulated Motion for Extension of Time. The parties previously stayed  
the case and, since that time the counsel for Defendants has changed and the Parties have been  
working to exchange information and data informally to determine whether they can settle this  
case without the need for litigation. While the Parties are continuing to determine whether they  
may be able to resolve this case, they also see the need to move forward with litigation on some  
threshold issues and therefore the Parties jointly state as follows:

27 STIPULATED MOTION FOR EXTENSION - 1

28 **Rekhi & Wolk, P.S.**  
29 529 Warren Avenue N., Suite 201  
30 Seattle, WA 98109  
31 Phone: (206) 388-5887  
32 Facsimile: (206) 577-3924

1. On February 2, 2023, Plaintiff commenced this civil action by filing his Complaint  
2 in the King County Superior Court. Dkt. # 1-2. On February 27, 2023, Plaintiff filed his Amended  
3 Complaint. Dkt. # 1-3.

4. On April 13, 2023, Defendants removed the case from King County Superior Court  
5 to this Court. Dkt. # 1.

6. On April 24, 2023, the Court issued an Order Regarding Initial Disclosures, Joint  
7 Status Report, and Early Settlement. Dkt. # 10.

8. The parties have attempted to resolve the matter but require additional time to  
9 determine if resolution of possible.

10. The parties request the deadline for Plaintiff to file a Motion to Remand, the deadline  
11 for Defendant to file a responsive pleading, and all other initial court deadlines to be extended by  
12 a few weeks.

13. IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

14. DATED: December 15, 2023

K&L GATES LLP

15. By: /s/ Shelby R. Stoner  
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17. Shelby R. Stoner, WSBA # 52837  
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22. patrick.madden@klgates.com  
23. shelby.stoner@klgates.com  
24. Attorneys for Defendants

25. DATED: December 15, 2023

REKHI & WOLK, P.S.

26. By: /s/ Hardeep S. Rekhi  
27. Gregory A. Wolk, WSABA #28946  
28. Hardeep S. Rekhi, WSBA #34579  
29. Erika Lane, WSBA #40854  
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STIPULATED MOTION FOR EXTENSION - 2

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STIPULATED MOTION FOR EXTENSION - 3

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**ORDER**

Upon consideration of the Parties' Stipulated Motion for Extension, the Court finds that good cause exists to extend certain deadlines, and it is hereby **ORDERED** that the Motion is **GRANTED**.

It is **FURTHER ORDERED** that filing deadlines and the current case schedule will be modified as follows.

Event	Current Date	New Date
Motion to Remand	December 15, 2023	January 26, 2024
If no Motion to Remand is filed, then the following deadlines apply:		
Responsive Pleading	December 29, 2023	February 9, 2024
Fed. R. Civ. P. 26(f) Conference	January 12, 2024	February 23, 2024
Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1)	January 26, 2024	March 8, 2024
Joint Status Report and Discovery Plan as required by Fed. R. Civ. P. 26(f) and Local Civil Rule 26(f)	February 5, 2024	March 15, 2024

DATED this \_\_\_\_ day of \_\_\_\_\_, 2023.

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BRIAN A. TSUCHIDA  
United States Magistrate Judge

STIPULATED MOTION FOR EXTENSION - 5

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